

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

NELSON SANCHEZ )

Criminal No. 05-30036-MAP

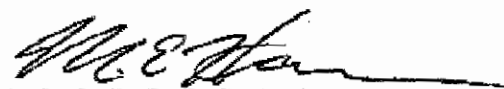
MOTION TO CONTINUE SENTENCING

Now comes Counsel for the Defendant and respectfully moves this Honorable Court to continue the sentencing of the above captioned matter from the currently scheduled date of July 18, 2006 to August 17, 2006 or some other date convenient for the Court. Further, Counsel requests until July 15, 2006 to file any objections to the Presentence report.

As reasons for this request Counsel cites the failure of having had a meaningful discussion of the presentence investigation report with the Defendant. As reasons for this failure, Counsel cites the confluence of the Defendant's lack of mental sophistication, the logistical difficulty of communicating with the Defendant who is being housed in Concord, MA and Counsel's personal health conditions.

For all of the reasons stated above, Counsel prays that this motion be allowed.

Nelson Sanchez,  
By His Attorney,



Mickey E. Harris  
1350 Main Street, 10<sup>th</sup> Floor  
Springfield, MA 01103  
(413) 731-5800  
BBO #563818

CERTIFICATE OF SERVICE

I hereby certify that I have sent a copy of this Motion To Continue to AUSA Todd Newhouse sending same via U.S. 1<sup>st</sup> class postage paid mail via U.S. Post Office at United States Attorney's Office, 1550 Main Street, 3<sup>rd</sup> Floor, Springfield, MA 01103.



Mickey E. Harris, Esquire